



Del Monte Fresh Produce N.A., Inc.

8/25/05
See -
Please post

August 22, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs
AMS, USDA
1400 Pennsylvania Avenue, SW
STOP 0237
Washington, DC 20250-0237

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RE: Docket No. FV03-925-1PR
Federal Register Vol.70, No. 100, Page 30001
Grapes Grown in a Designated Area of Southeastern California and Imported Table
Grapes; Proposed Change in Regulatory Period
COMMENTS IN OPPOSITION TO PROPOSED CHANGE

Dear Docket Clerk:

Del Monte Fresh Produce N.A., Inc. opposes the above referenced change in the dates that Table Grape Marketing Order 925 restrictions will be place on table grapes supplied from Chile. Del Monte Fresh Produce N.A., Inc. is a major importer of Chilean Fresh Produce.

Del Monte Fresh Produce N.A., Inc. concurs with the detailed comments and supporting data submitted by ASOEX, the Chilean Exporters Association. Specifically, Del Monte Fresh Produce N.A., Inc. urges the agency to reject the proposed change in the regulatory period because:

1. The change in the beginning effective date of the marketing order from April 20 to April 1 will have a direct negative impact on our business.
2. The proposed rule does not contain sufficient evidence of circumvention by Chilean table grapes to warrant the proposed change.
3. The change in date from April 20 to April 1 will create an artificial shortage of table grapes since there is no other commercially significant and reliable supply from any source other than Chile during that period.



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4. The Chilean grapes supplied from April 1 to the earliest commercially significant supplies of grapes from Coachella Valley in California meet marketing specifications from retail chains that are more stringent in some respects than the marketing order requirements.

Respectfully,

A handwritten signature in black ink, appearing to read 'Emanuel Lazopoulos'.

A small handwritten mark consisting of the letters 'E' and 'L' intertwined.
Emanuel Lazopoulos
Senior Vice President – Sales & Product Management
Del Monte Fresh Produce N.A., Inc.